

EXHIBIT
19

Chow, Michael C.

From: Bradley P. Lerman <BLerman@kasowitz.com>
Sent: Wednesday, December 1, 2021 5:03 PM
To: Chow, Michael C.; Heather Kim; 'Zembek, Richard'; 'Schramek, Adam T.'; Ning, Weimin; Martinelli, Richard F.; Calvaruso, Joseph; jjackson@jw.com; Canon-WSOU
Cc: WSOU v. Canon; Mark (waltfairpllc); Dietrich, Blake
Subject: RE: WSOU v. Canon
Attachments: WSOU v. Canon - Discovery Dispute Chart.docx

This message originated from outside your organization

Michael, please see attached dispute chart addressing the below and two other issues the Parties have conferred on. Please fill in Canon's positions and get back to us by Friday morning for submission to the Court. Thank you. Regards, Brad.

Bradley P. Lerman
Kasowitz Benson Torres LLP
1633 Broadway
New York, New York 10019
Tel. (212) 506-3388
Fax. (212) 835-5000
BLerman@kasowitz.com

From: Chow, Michael C. [mailto:mchow@orrick.com]
Sent: Tuesday, November 30, 2021 6:40 PM
To: Heather Kim <HKim@kasowitz.com>; 'Zembek, Richard' <richard.zembek@nortonrosefulbright.com>; 'Schramek, Adam T.' <adam.schramek@nortonrosefulbright.com>; Ning, Weimin <wning@orrick.com>; Martinelli, Richard F. <rmartinelli@orrick.com>; Calvaruso, Joseph <jcalvaruso@orrick.com>; jjackson@jw.com; Canon-WSOU <Canon-WSOU@orrick.com>
Cc: WSOU v. Canon <WSOUvCanon@kasowitz.com>; Mark (waltfairpllc) <mark@waltfairpllc.com>; Dietrich, Blake <bdietrich@jw.com>
Subject: RE: WSOU v. Canon

Hi Heather,

As you may be aware, Japan just instituted new travel restrictions and quarantine requirements due to the new COVID-19 variant. Given the rapidly changing restrictions and requirements worldwide, CINC cannot commit to providing witnesses for deposition outside of Japan in January 2022.

As an alternative, CINC is willing to provide the following until a resolution can be reached on this issue:

1. A verified response to an interrogatory related to CINC's first awareness of the Asserted Patents; and
2. A sworn declaration stating when, how, and who at CINC learned of the Asserted Patents.

Please let us know your thoughts on the above.

Regards,

Michael

From: Heather Kim <HKim@kasowitz.com>

Sent: Wednesday, November 24, 2021 8:56 AM

To: Chow, Michael C. <mchow@orrick.com>; 'Zembek, Richard' <richard.zembek@nortonrosefulbright.com>; 'Schramek, Adam T.' <adam.schramek@nortonrosefulbright.com>; Ning, Weimin <wning@orrick.com>; Martinelli, Richard F. <rmartinelli@orrick.com>; Calvaruso, Joseph <jcalvaruso@orrick.com>; jjackson@jw.com; Canon-WSOU <Canon-WSOU@orrick.com>

Cc: WSOU v. Canon <WSOUvCanon@kasowitz.com>; Mark (waltfairpllc) <mark@waltfairpllc.com>; Dietrich, Blake <bdietrich@jw.com>

Subject: RE: WSOU v. Canon

Hi Michael,

Please see responses highlighted below.

Hope you have a good Thanksgiving.

Thank you,
Heather

From: Chow, Michael C. [<mailto:mchow@orrick.com>]

Sent: Tuesday, November 23, 2021 3:44 PM

To: Heather Kim <HKim@kasowitz.com>; 'Zembek, Richard' <richard.zembek@nortonrosefulbright.com>; 'Schramek, Adam T.' <adam.schramek@nortonrosefulbright.com>; Ning, Weimin <wning@orrick.com>; Martinelli, Richard F. <rmartinelli@orrick.com>; Calvaruso, Joseph <jcalvaruso@orrick.com>; jjackson@jw.com; Canon-WSOU <Canon-WSOU@orrick.com>

Cc: WSOU v. Canon <WSOUvCanon@kasowitz.com>; Mark (waltfairpllc) <mark@waltfairpllc.com>; Dietrich, Blake <bdietrich@jw.com>

Subject: RE: WSOU v. Canon

Heather,

As we noted in CINC's objections and in my email to Brad Lerman last week, depositions must be taken in U.S. Embassies and Consulates in Japan, and remote depositions are not allowed. While CINC intends to identify witness(es) in response to WSOU's 30(b)(6) notice subject to CINC's objections, those witnesses will be in Japan, and it does not appear that these depositions will be able to move forward this year given the unavailability for scheduling. We disagree that depositions must be taken in Japan; particularly with the travel restrictions in place due to the ongoing pandemic. As discussed months ago, we propose Canon make its witnesses available remotely (e.g., from Hong Kong, other nearby country) or the United States (e.g., Waco, TX, Redwood Shores, CA, or New York). If Canon is unwilling to do so, please let us know by **COB Monday, November 29**, so that we may raise this issue with the Court. As you know, fact discovery will close in 4.5 months so we need to get these depositions completed in the near future.

Additionally, we disagree that discovery has been open in these cases as to CUSA since October 8, prior to when CUSA was even added as a party. However, CUSA will agree to respond to the 30(b)(6) notices by December 3. We look forward to receiving CUSA's responses to our 30(b)(6) notices by December 3.

We understand from your email below that you are seeking testimony regarding the topics identified below related to indirect infringement. Given the issues above, the Canon entities are willing to stipulate to an extension of time for WSOU to amend its pleadings to add indirect infringement claims, if warranted by discovery, in order for the parties to address the above issues. Please let us know WSOU's thoughts on this. Assuming Canon will make its witnesses available for depositions in January 2022, we propose extending the deadline to amend pleadings from January 4, 2022 to February 17, 2022.

Regards,

Michael

From: Heather Kim <HKim@kasowitz.com>

Sent: Monday, November 22, 2021 10:44 AM

To: Chow, Michael C. <mchow@orrick.com>; 'Zembek, Richard' <richard.zembek@nortonrosefulbright.com>; 'Schramek, Adam T.' <adam.schramek@nortonrosefulbright.com>; Ning, Weimin <wning@orrick.com>; Martinelli, Richard F. <rmartinelli@orrick.com>; Calvaruso, Joseph <jcalvaruso@orrick.com>; jjackson@jw.com; Canon-WSOU <Canon-WSOU@orrick.com>

Cc: WSOU v. Canon <WSOUvCanon@kasowitz.com>; Mark (waltfairpllc) <mark@waltfairpllc.com>

Subject: RE: WSOU v. Canon

This message originated from outside your organization

Hi Michael,

We are in receipt of Canon Inc.'s responses to WSOU's 30(b)(6) notices, and as noted in my earlier email, disagree that Canon USA's responses to the 30(b)(6) notices served on it are premature.

We renew our request that Canon and Canon USA provide us with witnesses and dates for topics 2 and 24, and catchall topics 39-40. As you know, our deadline to amend pleadings is quickly approaching. If you maintain your refusal to provide witnesses and dates, please let us know **by COB tomorrow, November 23**, so that we may approach the Court for resolution.

Thank you,
Heather

From: Chow, Michael C. [<mailto:mchow@orrick.com>]

Sent: Monday, November 8, 2021 12:05 PM

To: Heather Kim <HKim@kasowitz.com>; 'Zembek, Richard' <richard.zembek@nortonrosefulbright.com>; 'Schramek, Adam T.' <adam.schramek@nortonrosefulbright.com>; Ning, Weimin <wning@orrick.com>; Martinelli, Richard F. <rmartinelli@orrick.com>; Calvaruso, Joseph <jcalvaruso@orrick.com>; jjackson@jw.com; Canon-WSOU <Canon-WSOU@orrick.com>

Cc: WSOU v. Canon <WSOUvCanon@kasowitz.com>; Mark (waltfairpllc) <mark@waltfairpllc.com>

Subject: RE: WSOU v. Canon

ALERT: THIS IS AN EXTERNAL EMAIL. Do not click on any link, enter a password, or open an attachment unless you know that the message came from a safe email address. Any uncertainty or suspicion should be immediately reported to the Helpdesk.

Heather,

We object to your request below as premature. We further object to your request to the extent you are seeking a separate deposition for the topics that you have identified below. Canon and CUSA are still in the process of reviewing

the 30(b)(6) notices and, to the extent they agree to produce witnesses for any topics, they may identify witness(es) to testify on more than just the limited topics below.

Regards,

Michael

From: Heather Kim <HKim@kasowitz.com>
Sent: Saturday, November 6, 2021 4:31 PM
To: 'Zembek, Richard' <richard.zembek@nortonrosefulbright.com>; 'Schramek, Adam T.' <adam.schramek@nortonrosefulbright.com>; Ning, Weimin <wning@orrick.com>; Martinelli, Richard F. <rmartinelli@orrick.com>; Calvaruso, Joseph <jcalvaruso@orrick.com>; jjackson@jw.com; Chow, Michael C. <mchow@orrick.com>; Canon-WSOU <Canon-WSOU@orrick.com>
Cc: WSOU v. Canon <WSOUvCanon@kasowitz.com>; Mark (waltfairpllc) <mark@waltfairpllc.com>
Subject: RE: WSOU v. Canon

This message originated from outside your organization

Counsel for Canon,

Following up on the below, please provide us with witnesses and dates for topics 2 and 24, and catchall topics 39-40, of our 30(b)(6) notices to Canon and Canon USA.

Thanks,
Heather

This e-mail and any files transmitted with it are confidential and may be subject to the attorney-client privilege. Use or disclosure of this e-mail or any such files by anyone other than a designated addressee is unauthorized. If you are not an intended recipient, please notify the sender by e-mail and delete this e-mail without making a copy.

From: Heather Kim
Sent: Tuesday, November 2, 2021 9:27 AM
To: Zembek, Richard <richard.zembek@nortonrosefulbright.com>; Schramek, Adam T. <adam.schramek@nortonrosefulbright.com>; Ning, Weimin <wning@orrick.com>; Martinelli, Richard F. <rmartinelli@orrick.com>; Calvaruso, Joseph <jcalvaruso@orrick.com>; Jackson, John <jjackson@jw.com>; Chow, Michael C. <mchow@orrick.com>; Canon-WSOU <Canon-WSOU@orrick.com>
Cc: WSOU v. Canon <WSOUvCanon@kasowitz.com>; mark waltfairpllc.com <mark@waltfairpllc.com>
Subject: RE: WSOU v. Canon

Counsel,

Please provide us with witnesses and dates for topics 2 and 24, and catchall topics 39-40, of our 30(b)(6) notices to Canon and Canon USA.

Thank you,
Heather

From: Heather Kim
Sent: Friday, October 22, 2021 3:47 PM
To: Zembek, Richard <richard.zembek@nortonrosefulbright.com>; Schramek, Adam T. <adam.schramek@nortonrosefulbright.com>; Ning, Weimin <wning@orrick.com>; Martinelli, Richard F. <rmartinelli@orrick.com>; Calvaruso, Joseph <jcalvaruso@orrick.com>; Jackson, John <jjackson@jw.com>; Chow, Michael C. <mchow@orrick.com>; Canon-WSOU <Canon-WSOU@orrick.com>
Cc: WSOU v. Canon <WSOUvCanon@kasowitz.com>; mark <waltfairpllc.com> <mark@waltfairpllc.com>
Subject: WSOU v. Canon

Counsel,

Please see attached.

Thank you,
Heather

Heather Kim
Kasowitz Benson Torres LLP
333 Twin Dolphin Drive, Suite 200
Redwood Shores, CA 94065
Tel. (650) 453-5419
Fax. (650) 362-9316
HKim@kasowitz.com

NOTICE TO RECIPIENT | This e-mail is meant for only the intended recipient of the transmission, and may be a communication privileged by law. If you received this e-mail in error, any review, use, dissemination, distribution, or copying of this e-mail is strictly prohibited. Please notify us immediately of the error by return e-mail and please delete this message from your system. Thank you in advance for your cooperation.

For more information about Orrick, please visit <http://www.orrick.com>.

In the course of our business relationship, we may collect, store and transfer information about you. Please see our privacy policy at <https://www.orrick.com/Privacy-Policy> to learn about how we use this information.

NOTICE TO RECIPIENT | This e-mail is meant for only the intended recipient of the transmission, and may be a communication privileged by law. If you received this e-mail in error, any review, use, dissemination, distribution, or copying of this e-mail is strictly prohibited. Please notify us immediately of the error by return e-mail and please delete this message from your system. Thank you in advance for your cooperation.

For more information about Orrick, please visit <http://www.orrick.com>.

In the course of our business relationship, we may collect, store and transfer information about you. Please see our privacy policy at <https://www.orrick.com/Privacy-Policy> to learn about how we use this information.

NOTICE TO RECIPIENT | This e-mail is meant for only the intended recipient of the transmission, and may be a communication privileged by law. If you received this e-mail in error, any review, use, dissemination, distribution, or copying of this e-mail is strictly prohibited. Please notify us immediately of the error by return e-mail and please delete this message from your system. Thank you in advance for your cooperation.

For more information about Orrick, please visit <http://www.orrick.com>.

In the course of our business relationship, we may collect, store and transfer information about you. Please see our privacy policy at <https://www.orrick.com/Privacy-Policy> to learn about how we use this information.

**Discovery Chart for WSOU Investments LLC vs. Canon Inc. and Canon U.S.A., Inc.,
Civil Action No. 6:20-cv-00980 & 981 (ADA)**

Issue 1

WSOU's Position	Canon's Positions
<p><u>Relief sought:</u> Canon should be compelled to specifically identify which core technical documents Canon produced for each accused product and patent-in-suit or identify a representative core technical document production for the products. Canon should also be compelled to make available through remote deposition a 30(b)(6) deponent who is prepared to testify regarding its core technical documents and the location of existing English versions of such documents. To the extent Canon does not produce English versions, Canon should be ordered to cover the costs of translation.</p> <p><u>Summary:</u> Canon's production of core technical documents are primarily in Japanese. Canon's core technical document production was also made without specifically identifying which Accused Product the documents relate to, which patent-in-suit the documents relate to, or which subset of documents out of the thousands of foreign language pages produced are the core technical documents that WSOU should focus on. The manner in which the core technical documents have been produced is gamesmanship meant to delay and increase costs. The rule is not meant to allow defendants to provide the information in a format that makes understanding the materials difficult or costly, or requires follow up written discovery or depositions to even understand what information has been provided. <i>E.g.</i>, Dkt. 73 (10/8/21 OGP, requiring "Defendant shall produce...technical documents...sufficient to show the operations of the accused product(s)."). WSOU has made numerous requests for Canon to provide the documents in English and to provide needed clarification. Canon claims it does not have English versions of the materials and has</p>	

<p>refused to cooperate or provide the requested clarity such as which tranche of documents belong to which Accused Product. Given the delays in obtaining this information, Canon should be compelled to provide the information in English and identify specifically which core technical documents relate to each patent-in-suit and accused product. <i>See e.g., Contreras v. Isuzu Motors, Ltd. of Japan</i>, 1999 WL 33290667 (W.D. Tex. 1999) (“the defendants must provide the English translations...of such responsive documents if English translations have ever been made of such responsive documents). Canon should also be compelled to provide a remote 30(b)(6) deponent in the next two weeks on core technical documents and documents custodian issues.</p>	
---	--

Issue 2

WSOU’s Position	Canon’s Positions
<p><u>Relief sought:</u> Canon should be compelled to make its witnesses available remotely from Hong Kong or other nearby country, or the United States (<i>e.g.</i>, Waco, TX, Redwood Shores, CA, or New York), as Japan is currently closed its borders to foreigners due to the pandemic.</p> <p><u>Summary:</u> Canon has refused to provide any deposition dates for its witnesses. Canon contends that all depositions must take place in U.S. Embassies and Consulates in Japan, and remote depositions are not allowed in Japan. Canon will not commit to deposition dates at all this year, even in Japan, which is currently in lockdown due to the pandemic¹; this is preventing WSOU from taking needed discovery. WSOU respectfully requests that the Court order Canon to make its witnesses</p>	

¹ Japan has shut its borders to all foreign arrivals except those visiting on humanitarian grounds from November 30 until further notice. (<https://www.cnn.com/travel/article/japan-travel-covid-19/index.html>; <https://www.japan-guide.com/news/alerts.html>)

<p>available for depositions remotely (<i>e.g.</i>, from Hong Kong, other nearby country) or the United States (<i>e.g.</i>, Waco, TX, Redwood Shores, CA, or New York). <i>See e.g.</i>, <i>Sonneveldt v. Mazda Motor of Am.</i>, No. 8:19-cv-01298-JLS-KES, 2020 U.S. Dist. LEXIS 166177, at *9 (C.D. Cal. Aug. 5, 2020) (Japanese defendant required to make witness available); <i>Panasonic Corp. v. Getac Tech. Corp.</i>, No. SA CV 19-01118-DOC (DFMx), 2020 U.S. Dist. LEXIS 148177, at *3 (C.D. Cal. Aug. 6, 2020) (requiring Japanese party to make witnesses available via remote means).</p>	
---	--

Issue 3

WSOU's Position	Canon's Positions
<p><u>Relief sought:</u> Canon should be compelled to produce core technical documents on all products that are identified in WSOU's infringement contentions as well as products that use the same or reasonably similar technology.</p> <p><u>Summary:</u> Canon has indicated to WSOU that it is restricting discovery, including its core technical document production, to products that are specifically named in WSOU's infringement contentions. However, WSOU is entitled to discovery covering the products that are specifically identified in the contentions as well reasonably similar products that fall within WSOU's disclosed infringement theories. <i>See, e.g.</i>, <i>O2 Micro Int'l, Ltd. v. Monolithic Power Sys.</i>, 467 F.3d 1355, 1363 (Fed.Cir.2006); <i>Honeywell Int'l, Inc. v. Acer Am. Corp.</i>, 655 F.Supp.2d 650, 655-656 (E.D.Tex.2009); <i>Nidec Corp. v. LG Innotek Co., Ltd.</i>, No. 6:07-CV-108, 2009 WL 3673253, at *2 (E.D.Tex. Sept. 2, 2009).) This is because Plaintiff can only rely on public information and does not have access to internal Canon information.</p> <p>WSOU's investigation has revealed that the following products also likely infringe the '714</p>	

patent since they appear to support dual SD cards for simultaneous recordings in multiple encoding formats: XA15, XA11, XA20, SA25, XA35, XA30, XF605, VIXIA HF G21, G40, R70, and R72

WSOU's investigation has revealed that the following products also likely infringe the '346 patent since they also implement Bluetooth 5.0 adaptive frequency hopping:

Canon EOS R5, R3, IVY CLIQ+2 Instant Camera Printer + App, PP2002, Canon PR5000-C Page Clicker, Canon WLAN/Bluetooth Module WMO1B, ESL Tag C213, ESL Tag C29,, ESL Tag C26, Canon MK5000, Cable ID Printer PR-TP002, ESL Gateway CG001, Canon PReaGT-50, 50WW, 50P, 50PWW, RBL-C Wireless Bluetooth Remote RPL-C, RPL-S, RPL-N, Printer Platform, BTPrint Platform –V3 35.01, CBT-2020-v4.3-2018, CBT-2020-V4.30 XMTR-N17 Demo Kit, Pressure Measurement System KS-SYS1A.

The Court should not allow Canon, who has exclusive and internal knowledge regarding its own products and products of related companies, to avoid its discovery obligations by claiming that it will only provide discovery on products that WSOU specifically identifies.